

## Danner, Ward

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**From:** Doug Daugherty <dougherty@Environcorp.com>  
**Sent:** Thursday, July 03, 2014 4:29 PM  
**To:** Armann, Steve  
**Cc:** Huetteman, Tom; Santos, Carmen; slyon@smmusd.org; Wahrenbrock, Sarah; Maez, Jan (jmaez@smmusd.org); Eric Wood; Carol Serlin  
**Subject:** RE: EPA Comments of the District's PCB Plan -- Clarification on June 4th EPA comment letter on the SMMUSD Comprehensive PCB Plan  
**Attachments:** Malibu Site Specific PCB Remedation Plan\_2014\_0703.pdf

Steve,

Please find attached the MHS Specific Plan requested in your June 4, 2014 letter to the District for your review and approval. Please confirm receipt.

Please let me know if you have any questions.

Regards,  
Doug

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**From:** Armann, Steve [mailto:Armann.Steve@epa.gov]  
**Sent:** Friday, June 27, 2014 8:52 AM  
**To:** Doug Daugherty  
**Cc:** Huetteman, Tom; slyon@smmusd.org  
**Subject:** RE: EPA Comments of the District's PCB Plan -- Clarification on June 4th EPA comment letter on the SMMUSD Comprehensive PCB Plan

Doug,

When we requested that both plans be submitted within 30 days, we did not account for the significant data collection activities the District is currently undertaking and how that data will be used to influence the General Plan. Furthermore, as we mention in our letter, the General Plan is not formally required and is essentially a voluntary action by the District. I concur with your clarification regarding the due date for the General Plan.

We look forward to receiving the Malibu High School specific plan next week and working with you throughout the summer as you collect additional data and develop the General Plan.

Please call me if you have any questions or further clarifications.

Steven S. Armann, Manager  
Corrective Action Office (LND-4-1)  
USEPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

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Fax: 415-947-3533  
Email: [armann.steve@epa.gov](mailto:armann.steve@epa.gov)

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**From:** Doug Daugherty [<mailto:ddaugherty@Environcorp.com>]

**Sent:** Thursday, June 26, 2014 12:19 PM

**To:** Armann, Steve

**Cc:** Huetteman, Tom; [slyon@smmusd.org](mailto:slyon@smmusd.org)

**Subject:** RE: EPA Comments of the District's PCB Plan -- Clarification on June 4th EPA comment letter on the SMMUSD Comprehensive PCB Plan

Dear Steve,

As per our discussions, ENVIRON is seeking clarification and confirmation on the deliverables requested by EPA in its June 4<sup>th</sup> letter to SMMUSD.

One part of the EPA letter addressed preparing a document with a focus on a Malibu High School (MHS) specific plan to address the four rooms where caulk has been tested and shown to be above 50 ppm PCBs. We appreciate the clarification on the content of this plan during our meeting on June 17<sup>th</sup>. Our intent is to provide you this MHS-specific plan that addresses areas with tested caulk above 50 ppm PCBs by July 4<sup>th</sup>.

A second part of your letter addressed revisions to ENVIRON's General Plan for management of potentially PCB containing materials in SMMUSD schools. We understand that your intent is to review this revised General Plan and provide comments on its consistency with national approaches to PCBs in schools. It is our understanding that EPA may concur with the General Plan but will not approve it. As we discussed, ENVIRON is proposing to use the data and information collected this summer during the inspections and sampling at MHS and Juan Cabrillo Elementary School (JCES) as well as comments provided to date on the General Plan in order to revise the General Plan. As the final data on this summer's activities will not be available until later this summer and early fall, ENVIRON proposed moving the submission of a revised General Plan to EPA until this fall so we can incorporate the data from MHS and JCES into one revised General Plan. We understand that EPA is agreeable to this approach and would like to obtain your confirmation that the revised District General Plan is no longer due to EPA by July 4<sup>th</sup>.

Please reply to this email to confirm your concurrence regarding the content of the MHS specific plan, which will be delivered to EPA by July 4th, and to confirm that the revised General Plan is no longer due to EPA by July 4. We appreciate EPA's continued dialogue with us on this.

Regards,  
Doug

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**From:** Huetteman, Tom [<mailto:Huetteman.Tom@epa.gov>]

**Sent:** Wednesday, June 04, 2014 3:14 PM

**To:** [slyon@smmusd.org](mailto:slyon@smmusd.org)

**Cc:** [thomas.cota@dtsc.ca.gov](mailto:thomas.cota@dtsc.ca.gov); Doug Daugherty; Santos, Carmen; Armann, Steve

**Subject:** EPA Comments of the District's PCB Plan

Dear Superintendent Lyon,

Attached are EPA's comments on the "Comprehensive PCB-Related Building Materials Inspection, Management, and Removal Plan for Santa Monica-Malibu Unified School District." Per the attached letter, please contact Carmen Santos to schedule a call to discuss these comments. Steve Armann is out on vacation until June 16. During his absence, feel free to contact me or Carmen.

Sincerely,

Tom Huetteman, Assistant Director  
RCRA Branch, Land Division, USEPA Region 9  
415-972-3751

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